



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/28/2023

HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
LAW DEPARTMENT

100 CHURCH STREET  
NEW YORK, NY 10007

STEVE STAVERIDIS  
Senior Counsel  
Phone: (212) 356-2687  
Fax: (212) 356-3508  
sstavrid@law.nyc.gov

August 25, 2023

Application GRANTED.

SO ORDERED.

Handwritten signature of Jennifer H. Rearden.  
August 28, 2023

**VIA E.C.F.**  
Honorable Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Wright v. City of New York et al.  
22-cv-03137 (JHR)

Your Honor:

I am an Assistant Corporation Counsel representing defendants in the referenced matter. I write respectfully on behalf of both parties to request an extension of the fact discovery deadline from August 25, 2023 to October 9, 2023.

The extension is needed so as to allow the parties time to complete depositions, which have been delayed, in part, because of an illness suffered by a family member of plaintiff. The parties have rescheduled depositions and anticipate completing all fact discovery by the proposed new date. The parties further advise that neither side will be conducting expert discovery. Since the end date for expert discovery is October 9, 2023, the requested extension will not affect any other dates in the Civil Case Management Plan.

Accordingly, it is respectfully requested that the Court grant the parties joint application to extend the deadline for all fact discovery from August 25, 2023 to October 9, 2023

I thank the Court for its consideration of the foregoing

Respectfully submitted,

s/ *Steve Stavridis*

Steve Stavridis  
Senior Counsel

Encl.

cc: All Counsel of record (via ECF)